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RECEIVED

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Mr. Herbert W. Zeiler
Wireless Telecommunications Bureau
Federal Communications Commission
Room 8010
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Re: FCC PR Docket No. 92-235;
American Petroleum Institute
Petition for Reconsideration

Dear Herb:

This has reference to our meeting of June 9, 1997 during which we reviewed, on behalf of our client, the American Petroleum Institute ("API"), its Petition for Reconsideration in PR Docket No. 92-235. API strongly urged the Commission in that Petition to establish protective service contours ("PSCs") for existing Petroleum Radio Service systems, particularly (1) 39 dBu PSCs for existing UHF systems; (2) 37 dBu PSCs for existing VHF systems; and (3) 30 dBu PSCs for existing low band systems. API emphasized that the proposed PSCs would apply only to current Petroleum Radio Service systems. API also proposed that the Petroleum Frequency Coordinating Committee's ("PFCC") concurrence be required for the grant of any application that seeks authority to share any channel currently allocated to the Petroleum Radio Service in which an applicant's system would impinge on the existing system in excess of the following values:

[F]or UHF systems operating in the band 450-470 MHZ, an applicant's 21 dBu contour may not impinge upon the 39 dBu contour of the existing system; for VHF systems employing channels from the 150-174 MHZ band, an applicant's 19 dBu contour may not encroach upon the 37 dBu contour of the existing system; and for systems operated on channels below 50 MHZ, an applicant's 12 dBu contour may not encroach upon the 30 dBu contour of an existing system.

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API reasoned that adoption of these measures would permit greater sharing of Petroleum Radio Service channel assignments in areas where they are not employed for critical functions while, at the same time, protecting existing systems.

API is especially concerned about many areas throughout the country which experience heavy spectrum usage to support petroleum and natural gas exploration, production, pipeline transportation, and refining activities. These include, but are certainly not limited to, the Puget Sound area, San Francisco and the surrounding Bay Area, much of Southern California from Bakersfield south to San Diego, the Four Corners area of Arizona, New Mexico, Colorado and Utah, the production areas of Wyoming, Montana, and the Dakotas, Eastern New Mexico, much of West Texas, and Oklahoma, as well as Texas and Louisiana Gulf Coast, including Houston, New Orleans, and Mobile, and throughout the exploration and production areas of the Gulf of Mexico. There is also a high level of refining and marine transportation activity in the Delaware River Valley, including Philadelphia, and the Northern New Jersey and New York area. The entire country is crisscrossed with a vast number of natural gas, crude oil and petroleum product pipelines which literally run both the width and breadth of the country, delivering energy sources to far-flung cities in the Midwest to those in the Northeast, including New York, Hartford and Boston.

Accordingly, API strongly believes that the proposed protected service contour approach will meet both the Commission's objective of enhanced spectrum utilization while, at the same time, ensuring that critical communications necessary for day-to-day operation of the natural gas and petroleum industries remain secure. Please let us know should further information be helpful.

A copy of this letter is being provided the Commission's Office of the Secretary for inclusion in the PR Docket No. 92-235 record.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne V. Black". The signature is fluid and cursive, with a large, stylized "W" and "B".

Wayne V. Black

cc: Mr. Ira R. Keltz
William S. Caton, Acting Secretary